

National Aeronautics and Space Administration

Kennedy Space Center  
Kennedy Space Center, FL 32899

June 29, 2011



Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Attendance at the STS-135 Pre-Launch Reception hosted by Barrios and Jacobs

On July 6, 2011, Barrios Technology and Jacobs Technology Inc. will host a reception in anticipation of the STS-135 launch. The event will be held from 8:00 pm to 11:00 pm at the Hilton Hotel Atlantis Grill Restaurant in Cocoa Beach, Florida. Approximately 300 guests have been invited to attend. These guests include corporate and industry executives and workers, members of academia, military leaders, aerospace contractors, community leaders, representatives of Federal, state, and local government, members of the public, media representatives and NASA personnel. The approximate value of the reception is \$15 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in NASA personnel attending the event. This event will allow NASA employees to discuss the Space Shuttle program, the International Space Station, and the STS-135 mission, Atlantis' final flight and the final mission of the Space Shuttle program, with the other attendees. In addition, this event is a forum for attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group.

Accordingly, NASA employees whose duties do not substantially affect the sponsor may accept an invitation for complimentary attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office. Moreover, NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they reimburse the sponsor the cost of the reception.

A handwritten signature in cursive script, appearing to read "Jerald D. Stubbs".

for Jerald D. Stubbs  
Agency Designee